

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARIA ANTONIA CILANO

and

FELICIA WIGGINS.

(on behalf of themselves and on behalf
a Class of similarly situated persons)

Civil Case: 8:19-cv-00827-PWG

v.

**BARBARA Q. SHEA (d/b/a Shea
Management, Inc.), et al.**

Defendants

**PLAINTIFFS' MOTION TO FINALLY APPROVE SETTLEMENT CLASS, APPOINT
CLASS COUNSEL AND CLASS REPRESENTATIVES, AND FOR CERTIFICATION OF
CLASS FOR SETTLEMENT**

Plaintiffs Maria Cilano and Felicia Wiggins (hereinafter, "Plaintiffs") previously entered into a settlement agreement with Defendant Barbara Q. Shea d/b/a Shea Management, Inc. ("Shea") (collectively, "the Parties").¹ Now Plaintiffs, by and through their undersigned counsel, move this Honorable Court to finally approve the Settlement Class, appoint Plaintiffs as class representatives; to appoint their counsel as Class Counsel; and for certification of a Settlement Class, and in support thereof offers the following:

1. Plaintiffs previously sought preliminary approval of the Settlement Class reached by the Parties in this action (ECF 92). The Motion and its exhibits are incorporated by this reference. The Court granted the Motion for Preliminary Approval by Order dated April

¹ It is anticipated that the Plaintiffs and Shea will present a joint, proposed Final Order shortly. Shea's counsel was unexpectedly tied up with other matters before this filing. Shea may also elect to file further responses.

30, 2021 (ECF 94). The Settlement Agreement was attached as Exhibit 1 to the Motion for Preliminary Approval (ECF 92-1).

2. The Settlement Agreement proposes a class consisting of:

Those persons, in the three years before the commencement of this action to the present, from whom Shea attempted and/or actually collected a consumer debt on behalf of any other person, who owned a unit in Stonegate Condominiums or Grand Bel Manor Condominium for personal purposes. Excluded from the Class are any persons who were members of the settlement class in *Martinez v. Shea* in the Circuit Court for Montgomery County.

3. The claims addressed by the class are:

Any claims related to whether Shea was permitted to collect or attempt to collect from the Class Members while unlicensed as a Maryland collection agency pursuant to MCALA.

4. The Plaintiffs' Counsel, Phillip Robinson moves to be appointed as class counsel.
5. The Plaintiffs believe that the settlement is fair and adequate and that a settlement class should be certified. All of the requirements for a class under Rule 23(a) and (b)(3) are met.
6. The notice approved by the Court of the proposed settlement was timely sent to the Class Members as directed by the Court.
7. A memorandum in support of this Motion is filed herewith.

WHEREFORE, the Plaintiffs ask that the Court finally approve the Settlement Agreement, certify a settlement class, appoint the Plaintiffs as class representatives and their counsel as class counsel and certify a settlement class in this action and such other relief that may be necessary or appropriate.

Respectfully Submitted,

Respectfully Submitted,

/s/Phillip R. Robinson

Phillip R. Robinson

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Counsel for the Plaintiff and Class

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing and attachments was sent to all parties and counsel of record when this motion was filed with the Court's ECF service.

/s/ Phillip Robinson

Phillip Robinson